



Tom Barrett
Mayor, City of Milwaukee

May 5, 2008

Roberto Gutierrez
WisDOT Project Manager
Wisconsin Department of Transportation
Southeast Regional Office
141 N.W. Barstow Street
Waukesha, WI 53187-0798

Dear Mr. Gutierrez:

We wish to submit public comments on the Federal Highway Administration's and the Wisconsin Department of Transportation's Final Environmental Impact Statement for the I-94 North-South Corridor reconstruction and expansion project.

Specifically, we must re-emphasize the need for a comprehensive and balanced approach to transportation in our region. The 2035 Regional Transportation Plan for Southeastern Wisconsin calls for investment in both freeways and mass transit alternatives. Additionally, local road infrastructure for municipalities faces many current challenges. There is no better time to consider these issues as part of a balanced transportation approach than during the I-94 North-South Corridor Study.

The I-94 reconstruction and expansion project is a \$1.9 billion effort – the largest in the history of the State of Wisconsin. Given the enormous price tag, the skyrocketing costs of gas and energy, and the tremendous opportunity that this project presents to advance many modes of transportation, we must reiterate our continued disappointment that the DEIS and the FEIS for the I-94 North-South Corridor Study have not incorporated mass transit into the mix of alternatives.

The I-94 project represents yet another example of the State Department of Transportation's failure to invest in mass transit alternatives at a level on par with its commitment to freeway spending. A recent analysis by the City of Milwaukee found that in the period between 1992 and 2007, WisDOT spent \$19.2 billion on highways, yet rail and mass transit investment reached just \$2.2 billion. Clearly this does not represent a balanced approach, and WisDOT must play an equivalent lead role in regional mass transit initiatives as it does with freeway projects.

At the same time, better balance in our regional transit strategy should also be applied to the State's investment in local roads. In 1999, the City of Milwaukee received \$27.8 million in State dollars for roads and streets; in 2008 the City received \$26.32 million – when adjusted for inflation that represents a 32% decrease over the past 10 years.

Milwaukee, meanwhile, has increased its expenditures to cover this shortfall. The 2005 City Local Streets Capital budget was \$4.2 million; in 2008 it stands at \$5.5 million – an increase of more than 31%.

These are the critical dollars that repair our streets and fix potholes that wreak havoc on our cars, buses and trucks. If we are to consider spending hundreds of millions of dollars for new freeway construction and expansion, we must also address how to upgrade and maintain our current infrastructure that is showing wear and tear – wear and tear that is much more difficult to fix because of decreased local road aids to Milwaukee and other local communities.

The urgent need for better balance in State transportation spending assumes greater urgency when considering the I-94 North-South Corridor project. The Southeastern Wisconsin Regional Planning Commission has found that 94 % of all trips on I-94 between Kenosha and Milwaukee are local trips that start and end inside the region. This suggests that commuter rail service could accommodate much of the local travel demand along this corridor since the majority of trips do not go through the region, but rather are between cities along the I-94 North-South corridor. This could potentially preclude the need for freeway expansion, and ever-increasing gas prices only reinforce the need for greater mass transit alternatives like commuter rail.

Additionally, the FEIS itself acknowledges that freeway expansion in most sections of the I-94 North-South Corridor would result in little or no changes in drive times. Specifically the FEIS states, "Travel times would not vary by as much south of College Avenue. In Racine and Kenosha Counties, there would be little difference in travel times between the two alternatives (the Safety and Design Improvements with Added Capacity Alternative, and the Safety and Design Improvements Alternative)."

WisDOT estimates expanding the freeway from the Mitchell Interchange to the State Line from six to eight lanes would represent \$200 million of the project's total \$1.9 billion cost. In light of serious questions raised about the need for freeway expansion, this money could be better spent implementing a balanced transit strategy that includes mass transit alternatives and increased local road aids.

Let us be clear, it is not our suggestion that the State should halt investment in the I-94 North-South Corridor. We support freeway maintenance and believe WisDOT should invest \$1.7 billion on freeway reconstruction as planned.

But the fact remains that WisDOT and the State Legislature continue to treat regional mass transit improvements as a local responsibility, and cap State funding for mass transit at levels far below those freely distributed for freeway construction. WisDOT and the State Legislature have also failed to keep local road aids on pace with inflation, putting additional strain and burden on municipal budgets. The time is now for WisDOT to be as proactive in identifying and securing the necessary funding for regional mass transit projects and local road aids as it is with freeway projects.

The I-94 North-South Corridor project represents a tremendous opportunity to do just that – invest in our region's critical freeways, but also move forward on key mass transit projects and provide local municipalities the support they need to maintain local roads. Instead of spending \$200 million to reduce drive time by just 10 minutes for only those travelling southbound between Howard Avenue and College Avenue 30 years from now, WisDOT would better serve the public interest by investing these resources on important mass transit alternatives and increased local road aids that, in tandem with freeway reconstruction and renovation, move the region and Wisconsin forward.

WisDOT's core responsibility is to provide the policy, resources and network to enable all segments of the State's residents to move freely around Wisconsin via the most effective and sustainable modes of transportation available, not just highways. Our region's and our State's growth must be planned with balanced, multi-modal transportation options – options such as mass transit and local road aids that are presented fairly, accurately and with the same vigor and support as are current freeway plans.

To that end, we urge the Wisconsin Department of Transportation to invest \$1.7 billion to reconstruct the I-94 North-South Corridor between the Mitchell Interchange and the State Line, and reserve \$200 million for mass transit alternatives and increased local road aids.

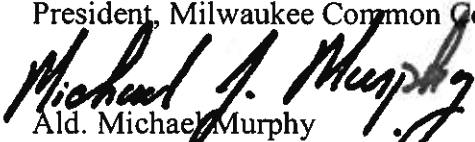
Sincerely,



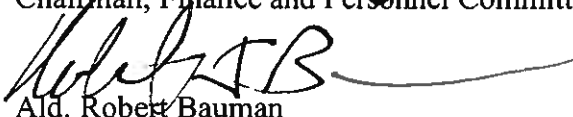
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